

CAHILL GORDON & REINDEL LLP
JOEL KURTZBERG (admitted *pro hac vice*)
FLOYD ABRAMS (admitted *pro hac vice*)
JASON ROZBRUCH (admitted *pro hac vice*)
LISA J. COLE (admitted *pro hac vice*)
32 Old Slip
New York, New York 10005
Telephone: 212-701-3120
Facsimile: 212-269-5420
jkurtzberg@cahill.com

DOWNEY BRAND LLP
WILLIAM R. WARNE (Bar No. 141280)
bwarne@downeybrand.com
MEGHAN M. BAKER (Bar No. 243765)
mbaker@downeybrand.com
621 Capitol Mall, 18th Floor
Sacramento, CA 95814
Telephone: 916-444-1000
Facsimile: 916-520-5910

Attorneys for Plaintiff X Corp.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

X CORP.,

Plaintiff,

v.

ROBERT A. BONTA, Attorney
General of California, in his
official capacity,

Defendant.

No. 2:23-cv-01939-WBS-AC

**STIPULATION TO CONTINUE THE
STATUS (PRETRIAL SCHEDULING)
CONFERENCE AND JOINT STATUS
REPORT**

Date: July 1, 2024
Time: 1:30 p.m.
Judge: Hon. William B. Shubb
Trial Date: None set
Action Filed: Sept. 8, 2023

1 Plaintiff X Corp. and Defendant Attorney General Rob Bonta,
2 in his official capacity, (collectively, the "Parties") hereby
3 stipulate, subject to the Court's approval, as follows:

4 WHEREAS, by joint stipulation on February 9, 2024, the Parties
5 requested that the Court continue the Status (Pretrial Scheduling)
6 conference set for February 26, 2024, pending the Ninth Circuit
7 preliminary injunction appeal. See ECF No. 41.

8 WHEREAS, on February 13, 2024, the Court granted the Parties'
9 request, stayed discovery until the Ninth Circuit has resolved the
10 appeal, continued the Status (Pretrial Scheduling) Conference to
11 July 1, 2024, and ordered the Parties file a joint status report
12 no later than June 17, 2024. See ECF No. 43.

13 WHEREAS, the Parties have fully briefed the preliminary
14 injunction appeal and the Ninth Circuit has scheduled oral argument
15 on the appeal for July 17, 2024.

16 WHEREAS, the Parties agree that (i) the issuance of a
17 scheduling order in the district court should be postponed until
18 the Ninth Circuit resolves Plaintiff's pending appeal because that
19 resolution will likely inform the subjects of any discovery and
20 the timing for discovery deadlines and pre-trial and trial
21 proceedings; and (ii) no other issues require resolution at the
22 July 1 Status (Pretrial Scheduling) Conference.

23 THEREFORE, the Parties stipulate, and respectfully request,
24 that the Court take the July 1 Status (Pretrial Scheduling)
25 Conference off calendar, and order the Parties to file a joint
26 status report within twenty-one days (or other amount of time that
27 the Court prefers) after the Ninth Circuit issues the mandate on
28 Plaintiff's appeal.

1 DATED: June 13, 2024

2
3 Respectfully submitted,

4 /s/ Joel Kurtzberg

5 CAHILL GORDON & REINDEL LLP

6 JOEL KURTZBERG (admitted *pro hac vice*)

7 FLOYD ABRAMS (admitted *pro hac vice*)

8 JASON ROZBRUCH (admitted *pro hac vice*)

9 LISA J. COLE (admitted *pro hac vice*)

10 32 Old Slip

11 New York, New York 10005

12 Telephone: 212-701-3120

13 Facsimile: 212-269-5420

14 jkurtzberg@cahill.com

15 DOWNEY BRAND LLP

16 WILLIAM R. WARNE (Bar No. 141280)

17 bwarne@downeybrand.com

18 MEGHAN M. BAKER (Bar No. 243765)

19 mbaker@downeybrand.com

20 621 Capitol Mall, 18th Floor

21 Sacramento, CA 95814

22 Telephone: 916-444-1000

23 Facsimile: 916-520-5910

24 *Attorneys for Plaintiff X Corp.*

25 ROB BONTA

26 Attorney General of California

27 ANTHONY R. HAKL

28 Supervising Deputy Attorney General

ANNA FERRARI

Deputy Attorney General

/s/ Gabrielle D. Boutin (as authorized on
June 11, 2024)

Gabrielle D. Boutin

Deputy Attorney General

*Defendant Attorney General Rob Bonta, in
his official capacity*